

## Professional Flight Attendants Association

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Office of the Secretary
Federal Communications Commission
445 – 12<sup>th</sup> Street, SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Notice of Proposed Rulemaking – Docket No. WT 04-435

## Dear Madam/Sir:

This is in response to subject Notice of Proposal Rulemaking to consider lifting the current ban on inflight cellphone use by passengers of U.S. air carriers. On behalf of the Professional Flight Attendants Association, representing the 11,000 Northwest Airlines Flight Attendants, this is to present our views and specific objections with respect to such proposal.

As frontline employees, Flight Attendants today face a myriad of new responsibilities and challenges in the aircraft cabin. In fact, to simply communicate routine, timely information to passengers is difficult enough in light of inattention and interest in other than their surroundings let alone the absolute necessity to ensure their attention is held in the case of communicating emergency instructions should a non-routine event occur.

As incident/accident experience has shown, professional Flight Attendants remain the vital link to passengers' safety, security and survivability – and nothing should detract from this essential role.

Expanded use of devices able to receive and transmit a signal, i.e. cellular phones, in the confined space of an aircraft cabin also has the potential to increase misunderstandings, confusion and/or conflicts between passengers and crew. In consideration of the very real factors contributing to "air rage" and disruptive, unruly passenger events inflight, it is unconscionable to add yet another ingredient to the already dangerous mix – and require this nation's Flight Attendants to deal with and manage more "at risk" situations.

As travel industry, consumer organizations and communications specialists have reported, the widespread use of cellphone voice communications while at 30,000 feet needs to be discouraged. As Flight Attendants, we are inherently familiar with the factors of long flights and cramped space – all of which would add to the intolerance of excessive cellphone use and/or high-volume conversations while inflight. Yes – the last bastion of peace is being threatened: flight time!

No. of Copies reold Off List ABODE It is noted that the Federal Aviation Administration must evaluate all aspects of operational safety and its implications relative to any expanded inflight cellphone use. We encourage a very cautious approach be employed in this regard. Further study is – out of necessity – required.

As stakeholders in the aviation safety community, we cannot allow competition among the individual air carriers to prevail on this issue, detracting from the highest level of operational safety available to the general flying public. This would present an unacceptable option to increase revenue and only serve a small portion of passengers interested in buying into such perceived convenience.

While regulators, airframe and electronics equipment manufacturers continue to develop, test and evaluate equipment and technological advances, in addition to the operational implications, let us continue to use great caution in the consideration of any initiative, action or procedure which would weaken or detract from the long-standing prohibition of inflight use of cellular phones by passengers.

Let us continue to work in concert to ensure that the safety and security of the flying public is not compromised and our essential onboard roles are protected.

Thank you for your consideration of our position on this timely issue.

Sincerely,

PROFESSIONAL FLIGHT ATTENDANTS ASSOCIATION

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Jeanne M. Elliott

National Security and Regulatory/Legislative Affairs Coordinator

cc: Senator Ted Stevens
Senator Jay Rockefeller
Representative Don Young
Representative John Mica
Representative Jim Oberstar
Representative Peter DeFazio
Representative John Dingell